

FIRST SET OF INFORMATION REQUESTS FROM
NEW ENGLAND POWER COMPANY
TO THE CITY OF SALEM
D.T.E. 03-128

- NEP-1-1 In his testimony at the local public hearing in this proceeding, held in Salem on January 20, 2004, the City Solicitor testified that the City “will intend to fight any particular project that will either facilitate or hasten the demise of this particular plant”. Please explain the City’s understanding of the subject of this proceeding and its relationship to the City Solicitor’s statement.
- NEP-1-2 In the response to Question 3 in his testimony, Mr. Walsh acknowledges NEP’s easements at the Salem Harbor site. Please refer to Question and Answer 6 in Mr. Walsh’s testimony. Was any consideration given to notifying NEP of the plans to implement the Site Plan Review process for USGen’s ECP project, for coordination purposes or for any other reason? If not, why not?
- NEP-1-3 Please refer to Question and Answer 5 in Mr. Walsh’s testimony. What preparatory work took place between the City of Salem and USGenNE prior to the August 28, 2003 filing of the Site Plan Review Application to implement the Administrative Consent Order? How long did the preparatory work take to complete? Hours? Days? Weeks? Months?
- NEP 1-4 Please produce any recollections, documents, etc, of NEP’s contacts regarding its proposed capacitor bank project with Mr. Walsh, on the following dates: November 20, 2003; December 17, 2003; January 12, 2004.
- NEP-1-5 With reference to Question 7 in Mr. Walsh’s testimony, please produce all records regarding NEP’s application to the City for a Building Permit on October 1, 2003.
- NEP-1-6 Please refer to Question and Answer 7 in Mr. Walsh’s testimony. How much time elapsed between NEP’s application to the City for a Building Permit and the granting of that permit? What activities led up to the so-called 10-minute decision of the Salem Board of Appeals?
- NEP-1-7 Please refer to Question and Answer 7 in Mr. Walsh’s testimony. Please confirm the date on which the appeal period ends or ended for NEP’s automation project Site Plan Review?
- NEP1-8 Please explain the relevance of the City’s testimony on NEP’s automation project to this proceeding.
- NEP-1-9 Please refer to Question and Answer 9 in Mr. Walsh’s testimony. Have the City and USGen discussed redevelopment plans for the site? If so, has any

consideration been given to including NEP in those discussions?

- NEP-1-10 Please refer to Question and Answer 9 in Mr. Walsh's testimony. In the City's opinion, what role in the possible redevelopment of the site would be appropriate for an easement holder such as NEP?
- NEP1-11 What is the relevance of possible future site redevelopment to the project that is the subject of this proceeding?
- NEP-1-12 Please refer to Question and Answer 10 in Mr. Walsh's testimony. Please define and explain the term "Designated Port Area status."
- NEP1-13 What is the relevance of "Designated Port Area status" to the subject of this proceeding?
- NEP1-14 Please refer to the first paragraph of Answer 10 in Mr. Walsh's testimony. Is this founded on a scenario in which the generation plant is gone but the transmission facilities remain? Whether the answer is yes or no, please explain the statement in more detail. Please explain its relevance to the subject of this proceeding.
- NEP-1-15 Please refer to the first paragraph of Answer 10 in Mr. Walsh's testimony. What non-electric uses are contemplated by the City for the Salem Harbor Site?
- NEP-1-16 Please refer to the second paragraph of Answer 10 in Mr. Walsh's testimony. Please give a detailed explanation of the City's understanding of Salem # 1, the substation located at Peabody and Congress Streets, and its function as a network facility
- NEP1-17 Please explain the term "non-conforming use" as it is defined and used in the City's Zoning Ordinance and apply it to the Salem #1 substation at Congress and Peabody Streets.
- NEP 1-18 Please refer to the second paragraph of Answer 10 in Mr. Walsh's testimony. Please explain the relevance of the substation at Congress and Peabody Streets to the subject of this proceeding.
- NEP-1-19 Please refer to the second paragraph of Answer 10 in Mr. Walsh's testimony. Please explain the relevance of the South Harbor River Walk project to the subject of this proceeding.
- NEP 1-20 Please refer to Question and Answer 11 in Mr. Walsh's testimony. Please explain the following statement: "Security will become a major concern should the generating plant be closed".

- NEP1-21 Please refer to Answer 11 in Mr. Walsh's testimony. Please explain the meaning of "heightened level" of national security in the context of this proceeding.
- NEP 1-22 Please refer to Answer 11 in Mr. Walsh's testimony. Please explain in detail the City's apparent expectation that NEP should present a (national) security plan in this proceeding.
- NEP-1-23 Please explain the relevance of security issues to the subject of this proceeding.